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Attorneys for Plaintiff
 ELAN MICROELECTRONICS CORPORATION

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ELAN MICROELECTRONICS
 CORPORATION,

Plaintiff,

v.

PIXCIR MICROELECTRONICS CO. LTD.,

Defendant.

Case No. 2:10-cv-00014-GMN-(PAL)

**ELAN MICROELECTRONICS
 CORPORATION'S MOTION TO FILE
 UNDER SEAL EXHIBIT 4 TO THE
 DECLARATION OF SEAN P.
 DEBRUINE IN SUPPORT OF ELAN'S
 REPLY IN SUPPORT OF MOTION FOR
 SANCTIONS FOR FAILURE TO
 PROVIDE DISCOVERY**

Pursuant to Local Rule 10-5(b) and the Court's Protective Order dated September 22, 2011 [Doc. 40], Plaintiff Elan Microelectronics Corporation ("Elan") hereby requests leave of Court to file under seal the following document, which will be filed contemporaneously herewith:

1. Exhibit 4 to the Declaration of Sean P. DeBruine in Support of Elan's Reply in Support of Motion for Sanctions for Failure to Provide Discovery.

As grounds for this motion, Elan states that Exhibit 4 is designated by Defendant Pixcir

1 Microelectronics Co. Ltd. as “Confidential – Attorney Eyes Only” pursuant to the Stipulated
2 Protective Order in this matter.

3 Pursuant to Local Rule 10-5(b), Elan will file the above-referenced paper under seal with
4 the requisite notation: “FILED UNDER SEAL PURSUANT TO COURT ORDER DATED
5 SEPTEMBER 22, 2011.”

6 DATED: November 28, 2011 Respectfully submitted,

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8
9 By: /s/ Sean P. DeBruine
10 Robert J. Caldwell, Esq. (Nevada Bar No. 7637)
11 Matthew J. Christian, Esq. (Nevada Bar No. 8024)
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21 Attorneys for Plaintiff
22 ELAN MICROELECTRONICS CORPORATION
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CERTIFICATE OF SERVICE

I hereby certify that I am an Employee of Alston & Bird LLP, and that on the 28th day of November, 2011, I served a true and correct copy of foregoing **ELAN MICROELECTRONICS CORPORATION'S MOTION TO FILE UNDER SEAL EXHIBIT 4 TO THE DECLARATION OF SEAN P. DEBRUINE IN SUPPORT OF ELAN'S REPLY IN SUPPORT OF MOTION FOR SANCTIONS FOR FAILURE TO PROVIDE DISCOVERY AND [PROPOSED] ORDER** in one or more of the following manners:

(ELECTRONIC SERVICE) Pursuant to FRCP 5(b)(3) and LR 5-4, the above-referenced document was electronically filed and served upon the parties listed below through the Court's Case Management and Electronic Case Filing (CM/ECF) system:

(FACSIMILE) by sending a copy of the above-referenced document by facsimile to the parties at the facsimile numbers listed below; and

(EMAIL) by forwarding a scanned copy of the above-referenced document by email to the parties at the email addresses listed below:

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**[PROPOSED] ORDER GRANTING
ELAN MICROELECTRONICS
CORPORATION'S MOTION TO FILE
UNDER SEAL**

The Court has received plaintiff Elan Microelectronics Corporation's Motion to File Under Seal, filed on November 28, 2011. Good cause appearing, Elan's motion is hereby GRANTED. It is hereby ORDERED that the following documents may be filed under seal:

1. Exhibit 4 to the Declaration of Sean P. DeBruine in Support of Elan Microelectronics Corporation's Reply in Support of Motion for Sanctions for Failure to Provide Discovery.

IT IS SO ORDERED this 4th day of December, 2011.


Raji C. Goggin
United States District Court Judge

Respectfully submitted,

By: /s/ Sean P. DeBruine
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